

ORIGINAL

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IN THE UNITED STATES DISTRICT COURT
IN AND FOR DISTRICT OF DELAWARE

WILLIE DAVIS, JR.,)
NATHANIEL BRIDDELL,)
GEORGE W. FEDDIMAN,)
JOSEPH GARRISON,)
ROY H. WALTERS,)
ALL SIMILARLY-SITUATED CURRENT)
AND FORMER EMPLOYEES OF)
MOUNTAIRE FARMS, INC.,)
MOUNTAIRE FARMS OF DELMARVA,)
INC., and MOUNTAIRE FARMS)
OF DELAWARE, INC.,)
Plaintiffs,)
-vs-)
MOUNTAIRE FARMS, INC.,)
MOUNTAIRE FARMS OF)
DELMARVA, INC., and)
MOUNTAIRE FARMS OF)
DELAWARE, INC., all Delaware)
corporations,)
Defendants.)

C.A. No. 04-0414-KAJ

Deposition of ROY H. WALTERS, taken before
Pamela C. Washington, Registered Professional Reporter
and Notary Public, at the law offices of Young,
Conaway, Stargatt & Taylor, 110 West Pine Street,
Georgetown, Delaware, on February 15, 2005, beginning
at 10:00 a.m.

APPEARANCES:

On behalf of the Plaintiffs:
Margolis Edelstein
BY: JEFFREY K. MARTIN, ESQ.
and KERI WILLIAMS, ESQ.
1509 Gilpin Avenue
Wilmington, Delaware 19806

On behalf of the Defendant:
Shawe Rosenthal
BY: ARTHUR M. BREWER, ESQ.
and LAURA A. PIERSON SCHEINBERG, ESQ.
20 South Charles Street, 11th Floor
Baltimore, Maryland 21201

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Walters - Brewer

1 Q And what does he do?
2 A He work for Mountaire.
3 Q He works for Mountaire?
4 A Uh-huh.
5 Q And what does he do for Mountaire?
6 A Forklift operator.
7 O And he has the same last name as you?
8 A Yes.
9 Q Is he on your crew?
10 A Yes.
11 Q Do you attend church regularly, sir?
12 A Yes.
13 Q Okay, which church is that?
14 A Christ Church.
15 Q Where is that?
16 A Millsboro.
17 Q And what is the highest level of
18 education you received, sir?
19 A 10 years.
20 Q Why did you leave school at that point,
21 if you can tell me?
22 A Family. Family problems.
23 Q Oh, I'm sorry, okay. Family problems
24 such as you needed to go to work?
25 A Yes.

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A00684

Walters - Brewer

1 A Yeah.
2 Q Okay. That's where you received your
3 forklift certification?
4 A Yes.
5 Q Okay, and approximately when was that?
6 A 1965.
7 Q Okay. Your mental health for the last
8 10 years has been good, I assume?
9 A Yes.
10 Q And I know you had some surgery for
11 your knee replacement, but outside of that, your
12 physical health has been good also?
13 A Yes.
14 Q Outside of the knee replacement
15 surgery, did you have any other surgical problems?
16 A No.
17 Q No? Okay. When did you first become
18 employed with Mountaire?
19 A September 1982.
20 Q And what position did you start out at?
21 A Truck driver.
22 Q When you say truck driver, what kind of
23 truck were you driving?
24 A Live haul.
25 Q Okay. And tell me what your job duties

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A00685

Walters - Brewer

1 A Teamster's, yes.
2 Q And you were a member of that local
3 from the time you first started in '82?
4 A Yes.
5 Q Okay. How long were you driving a
6 truck as a live haul driver?
7 A Can you rephrase what you mean how
8 long?
9 Q Sure. You started in '82 driving a
10 truck; did there come a time when you had another
11 position?
12 A Yes.
13 Q What was that?
14 A Forklift operator.
15 Q Okay, and when did you get that
16 position?
17 A 1990.
18 Q 1990, that's close enough. And you
19 were a forklift operator?
20 A Uh-huh.
21 Q Did you consider that a promotion?
22 A No.
23 Q Did you make more money as a forklift
24 operator than you did as a truck driver?
25 A Yes.

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A00686

Walters - Brewer

1 Q But you didn't consider it a promotion?

2 A No.

3 Q Okay, tell me why.

4 A I was asked to do a favor.

5 Q Okay.

6 A I was asked to fill in as a forklift
7 operator until someone was found for that position.

8 Q Okay, and how long did you fill in?

9 A Eight years.

10 Q Well, did you come to think the job was
11 yours, after a while?

12 A Not really, not when I asked to be
13 transferred back to the original position as truck
14 driver.

15 Q Okay, so you preferred to drive a truck
16 as opposed to operate the forklift?

17 A Yes.

18 Q Okay. And you operated the forklift,
19 as you said, for eight years?

20 A Uh-huh.

21 MR. MARTIN: Yes?

22 THE WITNESS: Yes.

23 BY MR. BREWER:

24 Q So that's approximately 1998, okay.
25 What happened to you in 1998?

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A00687

Walters - Brewer

1 A I was transferred back to driving
2 truck.
3 Q So the favor finally ended?
4 A Yes.
5 Q Okay. During this time when you were a
6 forklift operator, did you have any position with
7 Local 355?
8 A Yes.
9 Q What was that?
10 A Union steward.
11 Q Okay. Also referred to as a shop
12 steward?
13 A Yes.
14 Q When did you become a shop steward?
15 A 1983.
16 Q 1983, so while you were a truck driver?
17 A Yes.
18 Q And how long did you hold that
19 position?
20 A Through 2001.
21 Q Through 2001?
22 A Uh-huh.
23 MR. MARTIN: Yes?
24 THE WITNESS: Yes.
25

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A00688

Walters - Brewer

1 BY MR. BREWER:
2 Q Tell me why you left the position in
3 2001.
4 A I was promoted.
5 Q To what?
6 A Crew leader.
7 Q Crew leader? Who promoted you to crew
8 leader?
9 A Mr. Doug Lynch.
10 Q Okay. And why did you have to leave
11 the shop steward position when you were promoted to a
12 crew leader?
13 A You're no longer under the Union when
14 you transfer out of the Union's position. Being a
15 crew leader, you're non-Union.
16 Q A member of management?
17 A Yeah.
18 Q Okay. That was yes, sir, I'm sorry?
19 A Yes.
20 Q Okay, all right. Do you need some more
21 water?
22 A No, I'm fine.
23 Q Okay. As a crew leader, your primary
24 duty was basically to manage the crew that you had?
25 A If that's the word you want to use.

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A00689

Walters - Brewer

1 Q If that's the word I want to use?

2 Well, I don't want to put any words in your mouth.

3 We'll get into that in more detail later on.

4 How many people were on the crew when
5 you became a crew leader in 2001?

6 A Eight.

7 Q There were eight on your crew. And did
8 you have a forklift operator assigned to you?

9 A It was one of the eight.

10 Q That was one of the eight? So you have
11 seven members, which is seven catchers then?

12 A Yes.

13 Q And you had drivers assigned to you,
14 live haul drivers?

15 A According to the shift that you worked.

16 Q Right. But there were drivers, the
17 same drivers that you would basically see?

18 A Yes.

19 Q Okay. You have been a crew leader
20 since 2001; from 2001 until today, have you ever had
21 new catchers put to your crew?

22 A Could you --

23 Q Have you ever had new catchers assigned
24 to your crew?

25 A Yes.

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A00690

Walters - Brewer

1 Q Okay. And did you have any
2 responsibility with respect to making sure they knew
3 how to go about catching chickens?

4 A I don't understand that one.

5 Q Okay. When a new catcher comes in to
6 your crew, okay, do you have any responsibility to
7 make sure he knows what he's doing?

8 A No.

9 Q No?

10 A No.

11 Q He just comes onto your crew and you
12 just turn him loose?

13 A He's ordered by the company.

14 Q He's ordered by the company?

15 A He's -- he's hired by Mountaire, he's
16 placed by Mountaire. I have no control over the
17 placement in the crew; they evaluate the man, they
18 hire the man, they place the man.

19 Q You have some input into who gets
20 hired, though, don't you?

21 A No.

22 Q How about Mr. George Drummond, are you
23 telling me you had no input into him getting hired at
24 all?

25 A No. Only to tell him to go to the

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A00691

Walters - Brewer

1 plant and get signed up, and go through the company's
2 procedure.

3 Q Right. So you told Mr. Drummond -- how
4 did you come to get to Mr. Drummond?

5 A Mr. Drummond asked me as a crew leader
6 how he could get a job with Mountaire, and I informed
7 him of the position that he had to go through in order
8 to get a job, that's all.

9 Q So you told him, "Gosh, sure. Go to
10 there and get --"

11 A I didn't say sure.

12 Q What did you say to Mr. Drummond?

13 A I said, "Mr. Drummond, you have to go
14 through company policy to work for Mountaire."

15 Q Okay. And do you know what that policy
16 is?

17 A You have to go through the channels, go
18 through personnel, drug tests -- what's the other
19 part? TB test. I'm not fully familiar with all of
20 the stuff that a man --

21 Q So you don't know what goes on in human
22 resources?

23 A No.

24 Q But you told him if he wanted a job, he
25 could go to human resources?

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A00692

Walters - Brewer

1 A Like anyone else.
2 Q And he did?
3 A I assume, yes.
4 Q Well, and he's working for you, isn't
5 he?
6 A Yes.
7 Q And how about Leon Tucker, didn't
8 Isaiah Daniels refer him to you?
9 A No, he referred him to Mountaire.
10 Q He referred him to Mountaire?
11 A Yes.
12 Q Okay. So then you don't have any
13 impact at all then as to who gets hired at all?
14 A No.
15 Q Okay. You can discipline people,
16 though?
17 A Yes.
18 Q And you have, haven't you?
19 A To a point, according to the work.
20 That's company policy that they allow me to follow.
21 Q So now this new catcher who comes to
22 your crew, who you don't do anything with, right? He
23 just walks into your crew and introduces himself and
24 says, "Hi, I'm John." And you say, "Fine, John. I'm
25 Roy," and he just goes to work, you don't have

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A00693

Walters - Brewer

1 Q All right. But, yet, you do nothing to
2 see if he does know anything about catching chickens,
3 is that your --

4 A I have to see if he know how to do the
5 job.

6 Q Okay. Now, if you see that he doesn't
7 know how to do the job, do you tell him how to go
8 about doing it the right way?

9 A No, not really. I let the rest of the
10 crew do that.

11 Q So that's your decision, you let the
12 rest of the crew tell him how to go about doing what
13 he's doing?

14 A It's not my decision. They have to
15 work with him; I don't.

16 Q Okay. You carry just a total of seven
17 catchers?

18 A No.

19 Q How many catchers do you carry?

20 A Accordingly sometime eight.

21 Q Okay. When you have eight catchers, do
22 you work them all the same day --

23 A No.

24 Q -- the same week? Some of the other
25 crew chiefs said they rotate people on a day off, is

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A00694

Walters - Brewer

1 that what you do also?

2 A Yes.

3 Q Okay. How do you go about deciding
4 which catcher is going to be off which day, when you
5 have eight catchers?

6 A You write the name down and begin one,
7 two, three, four, five, six.

8 Q Okay. So you write the names down, and
9 number one might be off Monday, number two might be
10 off Tuesday, number three might be off Wednesday --

11 A Yes.

12 Q -- and you decide how to do that?
13 Okay. Do we have Davis Number 2, I guess it is?

14 MR. MARTIN: Garrison Number 2.

15 MR. BREWER: Garrison 2, I'm sorry,
16 yes.

17 BY MR. BREWER:

18 Q Mr. Walters, I'm going to show you a
19 document that's been introduced to Mr. Garrison's
20 deposition as Exhibit Number 2 to his deposition, and
21 these are the live haul guidelines, have you seen
22 these before?

23 A Yes.

24 Q Okay. Let's go down, it talks about
25 crew leaders general duties, okay? It says here

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A00695

Walters - Brewer

1 arrive at the farm at the correct time; is that a duty
2 of the crew chief, crew leader?

3 A Yes.

4 Q Okay. It then talks about how the
5 house should be divided into a minimum of four equal
6 sections before the catching process starts; is that
7 also one of your responsibilities?

8 A Yes.

9 Q It also says they can be divided into
10 smaller sections, depending on how the house is set up
11 and so forth; is that one of your responsibilities?

12 A Yes.

13 Q Okay. It's true, isn't it, that
14 sometimes you have to divide the house only into maybe
15 three parts?

16 A Yes.

17 Q Okay. And that's a decision that you
18 would make based on your experience as to how you're
19 going to go about catching this?

20 A Yes.

21 Q You tell the catchers how many birds to
22 be placed in each compartment?

23 A Yes.

24 Q Or each hole, as it's referred to?

25 A Yes.

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A00696

Walters - Brewer

1 Q Okay. And when you're catching birds
2 at night, it talks about not moving the birds into
3 less than 70 percent of the normal floor space; is
4 that one of your normal responsibilities, to make sure
5 this is followed?

6 A Yes.

7 Q But sometimes that can't be done, can
8 it?

9 A No.

10 Q And so you would then have the birds
11 into less than 70 percent?

12 A Yes.

13 Q Sure. And that would be your call,
14 your decision to make?

15 A Yes.

16 Q Okay. Page 2 of this exhibit, it says
17 that crew leader's responsibility is to continually
18 observe the uncaught birds and prevent smothers --

19 A Yes.

20 Q -- is that a responsibility? And by
21 smothers, we're meaning having the chickens pile on
22 top of one another and die, is that what we're talking
23 about?

24 A Yes.

25 Q Okay. It says you're supposed to make

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A00697

Walters - Brewer

1 sure that the cages are stacked uniformly on the
2 trailer.

3 A They don't have to be.

4 Q They don't have to be?

5 A No. The trailers is already situated
6 for separation.

7 Q But it says they are, so it's a
8 responsibility of the crew leader to make sure they're
9 stacked uniformly?

10 A Yes, okay.

11 Q Okay?

12 A Yes.

13 Q And the cages that we're talking about
14 are the cages that the catchers put the chickens into?

15 A Yes.

16 Q And those cages are then taken by the
17 forklift operator and placed on the back of a flatbed
18 trailer?

19 A Yes.

20 Q And that's the responsibility here, to
21 make sure they're stacked uniformly, that's one of
22 your responsibilities as a crew leader?

23 A Yes.

24 Q Okay. The next item in item G on page
25 2 of this exhibit speaks to in the summer, making sure

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A00698

Walters - Brewer

1 the fans are left hanging; is that a responsibility
2 that the crew leader has?

3 A Yes.

4 Q And fans that are taken down should be
5 placed on the floor, fans should be blowing in the
6 same direction; is that your responsibility to make
7 sure that happens?

8 A Yes.

9 Q Okay. And did you tell catchers to
10 make sure that this occurs?

11 A Yes.

12 Q It talks about in the next item H,
13 about not loading any more than a specific number of
14 birds without permission; is that your responsibility,
15 to make sure that the catchers don't put more birds in
16 a particular compartment than they should?

17 A That is something you don't have
18 control over.

19 Q But this is --

20 A Once you tell the men how many to put
21 to the door, you cannot stand and watch what is put to
22 the door. So that might be a responsibility, but it's
23 a responsibility that can't be -- it can't be done.

24 Q Well, don't you observe them from time
25 to time catching the birds, and making sure?

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A00699

Walters - Brewer

1 A Sure.

2 Q Okay. So if somebody were putting more
3 in at that time, would you say something?

4 A If I observed them, yes.

5 Q Sure, okay. But what you're basically
6 saying is you can't always observe --

7 A You can't always catch that.

8 Q But if you can observe a catcher
9 putting in more than they should, you can tell them to
10 stop that?

11 A Yes.

12 Q Okay. It talks about filling out farm
13 tickets, we'll get to that in a second. The next item
14 it says is check with the driver to make sure the load
15 is secure and sent back to the plant, is that one of
16 your responsibilities?

17 A Yes.

18 Q Now, let's see if we can move through
19 this. Roman Numeral III on page 2 of this exhibit
20 speaks to various catching methods, there is night
21 catching; is it your responsibility to make sure that
22 the methods described here in night catching are
23 followed?

24 A Yes.

25 Q And if there's going to be a deviation

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A00700

Walters - Brewer

1 from this, you can deviate from this, depending on the
2 type of the house and the size of the birds and things
3 like that, can't you?

4 A Up to a point. If it had to be any
5 type of serious deviation, I must contact my
6 supervisor.

7 Q All right. But it says, for example,
8 under A, "Night catching: 1, Drive-ins, birds should
9 be caught in place as much as possible. If moving is
10 required, no less than 70 percent of the available
11 floor space should be used." You could use 50
12 percent, couldn't you?

13 A Yes.

14 Q Sure. The day catching, it talks about
15 drive-in or A-frame houses, and there are a series of
16 things that are listed here, talks about houses being
17 caught on the inside; that's your responsibility, to
18 make sure that the catchers follow this?

19 A Yes.

20 Q Okay. Fire fans should be placed at
21 the end of the house; is that your responsibility to
22 make sure that that happens?

23 A If at all possible, yes.

24 Q And if it's not there, can you tell the
25 catchers to position it at the end of the house like

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A00701

Walters - Brewer

1 the guidelines say?

2 A Excuse me for a minute. Certain
3 things, you don't understand about catching chickens.

4 Q Well, I can't say that I have caught
5 chickens, and I'm sure that's true.

6 A I'd like to take you to a chicken farm,
7 just off the record.

8 Q Well, I tell you what, maybe one day
9 we'll do that.

10 A It's not always possible.

11 Q All right, that's fine, it may not be
12 possible, and if it's not possible, then you make that
13 decision?

14 A Yes, I have to.

15 Q Yeah. If it is possible, but it isn't
16 done, you can tell a catcher to put this at the end of
17 the house, like the instruction says, correct?

18 A The catchers can't do that; it's the
19 forklift responsibility.

20 Q Okay, well, then you can tell the
21 forklift person to do that?

22 A Providing he don't get stuck down on
23 the other end, trying to do so.

24 Q Oh, I understand that, I understand
25 that. So the person who is responsible, you can tell

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A00702

Walters - Brewer

1 them to do it if it hasn't been done?

2 A Yes.

3 Q Okay. Item c, under day catching, the
4 small c, to be clear for the record, talks about
5 dividing the house and so forth and placing curtains
6 and all of that, you see that?

7 A Yes.

8 Q That's your responsibility to make sure
9 that's done?

10 A Yes.

11 Q As a practical matter, it can't always
12 be done the way this says, correct?

13 A Correct.

14 Q And if it can't be done that way, it's
15 your decision to get it done the best way it can be
16 done, making sure that you don't kill the birds?

17 A Yes.

18 Q Okay. Small item d talks about when
19 working both sides of the houses, the pens should
20 contain approximately one cage of birds; sometimes it
21 contains more, doesn't it?

22 A Yes.

23 Q Okay. And that would be your call,
24 your decision?

25 A Yes.

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A00703

Walters - Brewer

1 Q All right. We can take a look and go
2 down here, maybe you can do this so that we can try to
3 get you out on time, items e through h, talking about
4 fans blowing in the same direction, so forth and so
5 on, are these your responsibilities as a crew leader?

6 A Yes.

7 Q Okay. You make sure that the birds are
8 watered, or wet thoroughly if it's above 80 degrees?

9 A Yes.

10 Q And who does that?

11 A Truck driver.

12 Q Okay. And you will tell the truck
13 driver to make sure the birds get watered when it's 80
14 degrees or more?

15 A Yes.

16 Q Okay. And it talks about walk-out or
17 shed houses, I'm not sure what a shed house is but,
18 again, it's item 2, a through f, would you agree that
19 those are your responsibilities as a crew leader?

20 A Yes.

21 Q Okay. And if there is any deviation
22 required, you can make whatever changes you think are
23 appropriate in order to get the job done?

24 A Yes.

25 Q Okay. Roman Numeral 4 which appears on

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A00704

Walters - Brewer

1 page 3 talks about tunnel ventilation; could you take
2 a look at that and tell me if the responsibilities
3 that are listed there are the crew leader's in fact
4 responsibilities that you have?

5 A As a crew leader, yes.

6 Q Okay. And again, if there are any
7 changes that are required or deviations from these
8 responsibilities, you can make that decision based on
9 your experience?

10 A Yes.

11 Q If we continue along, we have tunnel
12 ventilation procedures and, again, what I'd just ask
13 you to do, since it's only two pages, if you just take
14 a quick look at the two pages and tell me if those are
15 responsibilities that you have as a crew leader?

16 A Yes.

17 Q And, again, if there's deviation, you
18 can make that decision to deviate, depending on what
19 you see with the house on a particular house when you
20 get there?

21 A Yes.

22 Q Okay. Mr. Walters, I'm going show you
23 another exhibit, this is Exhibit Number 1 to
24 Mr. Garrison's deposition. You know Mr. Garrison, by
25 the way, do you not?

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A00705

Walters - Brewer

45

1 A Yes.
2 Q Okay. This is called a farm ticket,
3 have you seen this before?
4 A Yes.
5 Q I'd like to go over some of the
6 information that's on this ticket. The upper
7 right-hand corner I see a date, who fills that in?
8 A I do.
9 Q You do as a crew leader?
10 A Yes.
11 Q So you put whatever date it is?
12 A Yes.
13 Q There's a lot number, who fills that
14 in?
15 A The scales.
16 Q Scales? And there is a load number,
17 who fills that in?
18 A Scales.
19 Q The people at the scale house?
20 A Yes.
21 Q Okay. There's a place for the grower,
22 the name of the grower, I would assume --
23 A Yes.
24 Q -- or the farmer, also called the
25 farmer, and who fills that in?

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A00706

Walters - Brewer

1 A I do.

2 Q It talks about houses, and there are a

3 series of blanks, who puts the information in there?

4 A I do.

5 Q Just for purposes of clarification for

6 the record, a farmer may have five houses and you

7 would be told to catch house one and four, so would

8 you put one and four in there?

9 A You put whatever house that you

10 catching the load out of.

11 Q Okay, fine. Time started, who fills

12 that in?

13 A I do.

14 Q And that's the time that you start

15 catching the chickens at the farm?

16 A Time you start loading the truck.

17 Q Time you start loading the truck? And

18 time finished, what is that?

19 A Time finished loading the truck.

20 Q And so this is done for each truck

21 then?

22 A Yes.

23 Q Okay. And there is a temperature, who

24 fills that in?

25 A Scales.

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A00707

Walters - Brewer

1 Q Scales fills that in? There's a
2 notation for a truck, who fills that information in?

3 A I do.

4 Q And we have had other testimony before,
5 each truck is numbered?

6 A Yes.

7 Q And the number is not the license plate
8 number, it's just a number that the company assigns to
9 the truck?

10 A Yes.

11 Q And the same is also true for the
12 trailer?

13 A Yes.

14 Q And who fills in the information for
15 the driver?

16 A His name, I do.

17 Q Okay. So you're putting in the truck
18 number, the trailer number, and the driver's name?

19 A Yes.

20 Q The number of doors, who fills that
21 information in?

22 A I do.

23 Q And then there's a total and an average
24 weight, who fills that in?

25 A I fill in the total of birds. The

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A00708

Walters - Brewer

1 average weight is done scale.

2 Q Okay. Now, going down to the second
3 part of the form, it says sign present, and there are
4 two boxes; who fills that out?

5 A I do.

6 Q And when it says sign present, what
7 does that mean?

8 A Is the sign present for the directions
9 to the farm, is it present at the driveway.

10 Q Okay. So that would be the Walters
11 Farm, when I drive up I can see a sign that says the
12 Walters Farm?

13 A Yes.

14 Q And one of your jobs is to make sure
15 that's up?

16 A No.

17 Q Well, put it this way: If it's not up,
18 you indicate that it's not up?

19 A Correct, yes.

20 Q And if it is up, you check the box that
21 says it is up?

22 A Yes.

23 Q I don't mean that it's your job to put
24 the thing in there yourself; it's your job to see
25 whether it's up or not?

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A00709

Walters - Brewer

1 A Yes.

2 Q Okay. The grower present, who checks
3 that box out?

4 A I do.

5 Q And what does that mean?

6 A Is the grower present at the farm when
7 we arrive.

8 Q All right, present, does that mean that
9 he is physically out there at the house, or does it
10 mean that he is inside, sleeping or watching TV, or
11 what does it mean?

12 A It means that he's there at the farm,
13 present.

14 Q To observe catching?

15 A To do his part.

16 Q To do his part, okay. What is his
17 part?

18 A That should be reflected within the
19 guidelines of company policy.

20 Q You say the guidelines of company
21 policy, you're referring to Garrison Exhibit 2, I saw
22 you looking at that, where it says Growers
23 Responsibilities?

24 A Yes.

25 Q Okay. Now, what happens if he doesn't

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A00710

Walters - Brewer

1 do these things?

2 A The job must get done.

3 Q All right. For example, one of the
4 grower's responsibilities I see here in Garrison
5 Exhibit 2, item b, is to pick up all dead birds
6 immediately prior to catching crews' arrival; if he
7 doesn't do that, who does that?

8 A No one.

9 Q Well, I guess they're not going
10 anywhere, so they just stay on the ground?

11 A Yes.

12 Q Okay. Item c talks about raising and
13 securing all equipment to the maximum height at the
14 proper time; suppose he doesn't do that, who does
15 that?

16 A We do.

17 Q We being?

18 A Crew.

19 Q The crew? Okay. Let's go back to
20 Exhibit 1, if we may. It says DAFs prior to catch,
21 DAF stands for dead at farm?

22 A Yes.

23 Q That's the number of chickens that are
24 dead at the farm? And DAFs prior to catch, yes or no,
25 who checks that box?

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A00711

Walters - Brewer

1 A I do.

2 Q How do you go about deciding whether to
3 check that box yes or no?

4 A When I approach the farm, in order to
5 see which house we going to get, we walk in, in order
6 to prepare for work. And if I observe that the farmer
7 hasn't picked up his birds as company policy say to,
8 then I write no.

9 Q You say the birds, you mean the dead
10 birds?

11 A Dead birds.

12 Q Okay. So if he's not picked it up,
13 would you check no, that he hasn't?

14 A Yes.

15 Q But if he has, you would check that?

16 A Yes.

17 Q Okay, thank you. Fire fan used, who
18 checks that?

19 A I do.

20 Q What does that mean?

21 A Did I use the fire fan.

22 Q Okay.

23 A Was the fire fan able to be used.

24 Q All right. And is it your decision as
25 to whether or not to use it?

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Milford

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A00712

Walters - Brewer

1 A According to temperature.

2 Q Okay. So then you will let the company
3 know whether you used it or you didn't?

4 A Yes.

5 Q Okay. Chickens watered, that's what we
6 talked about before with the driver watering the
7 chickens?

8 A Yes.

9 O And you will check whether the driver
10 did what he was supposed to do or not?

11 A Yes.

12 Q And if he doesn't, I think we talked
13 about you will go ahead and tell him to water the
14 chickens?

15 A Yes.

16 O Okay. The feeders up, who checks that
17 box?

18 A I do.

19 Q That's one of the grower's
20 responsibilities?

21 A Yes.

22 Q Okay. So if he's not done his job, you
23 will check no, that he didn't do it or he hasn't?

24 A No, no, I wouldn't. I would put no,
25 but then I would have to call the plant and inform my

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A00713

Walters - Brewer

1 supervisor that this job wasn't done for which it's
2 supposed to be done a certain amount of hours prior
3 to.

4 Q Okay. So you will arrive at the farm
5 and if the feeders aren't up, and I think that's one
6 of the things we mentioned to before, it says raise
7 and secure all equipment to the height at the proper
8 time, the feeders, that would be one of the equipment?

9 A Uh-huh, yes.

10 Q So you get to the farm, and you see the
11 feeder isn't up, the grower is not there, as you said
12 before, you will direct the crew --

13 A No.

14 Q Well, maybe I misunderstood you. You
15 said that if it's not done before, that you guys would
16 do it.

17 A The waters.

18 Q Oh, the waters, okay.

19 A The waters.

20 Q So it's not the feeders?

21 A Not the feeders.

22 Q Okay. You're right, I don't know as
23 much about catching as you do, but I wouldn't expect
24 to. So let's go to the waters; the waters are not up,
25 okay, you and the crew will raise the waters?

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A00714

Walters - Brewer

1 A Yes.
2 Q Okay. Now, when it comes to the
3 feeders, you will just call the plant and say the
4 feeders aren't up?
5 A Yes.
6 Q And what do you do, not catch the
7 house?
8 A No.
9 Q You don't catch the house?
10 A We do not work until we're told to.
11 Q Okay. So then it's important for you
12 to know whether those feeders are up or not?
13 A Yes.
14 Q Okay. How about stoves?
15 A No control.
16 Q No control, I don't understand that.
17 A The farmer's responsibility, we have no
18 control over the stoves.
19 Q But you're responsible for making sure,
20 for checking the box as to whether they are up or they
21 weren't up?
22 A Yes.
23 Q How about farm damage, who fills that
24 out?
25 A I do.

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A00715

Walters - Brewer

1 Q How do you go about deciding whether
2 there's farm damage or not?

3 A If there's any damage done by my
4 forklift driver or the crew, then I report it.

5 Q Okay. How do you know that the damage
6 that a farmer might report later wasn't done prior to
7 you guys getting there?

8 A We don't.

9 Q You don't?

10 A No.

11 Q So when you arrive, you don't take a
12 look at the house to see that everything's okay?

13 A Only as much as possible.

14 Q All right, I understand that. I don't
15 mean that you go around and give it a full inspection,
16 but you take a look around the farm to see if there
17 is --

18 A Oh, yes.

19 Q -- see if there's anything obvious
20 there?

21 A Yes.

22 Q And if there is, do you make that
23 information known to the grower?

24 A I make it known to my supervisor.

25 Q Okay. So you wouldn't say to the

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A00716

Walters - Brewer

1 grower when you got there and say, "I see your pole
2 over there has been hit before"?

3 A No.

4 Q You just make a note of that; you
5 wouldn't say anything like that to the grower?

6 A No, no.

7 Q Okay. But one of your jobs is to
8 maintain a good relationship with the grower, isn't
9 it?

10 A Yes.

11 Q So I'm curious as to why you wouldn't
12 say to the grower when you get out there, "By the way,
13 I see the pole has been, you know, been hit."

14 A It's something he should already know,
15 so I need not have to tell him that his pole is
16 already broke.

17 Q Well, I'm not talking about broken; I
18 mean if it were broken, everybody could see it. But
19 somehow in some way damaged, so you don't get in a
20 controversy later on when he tries to blame you guys
21 for doing it, and you know you didn't --

22 A No.

23 Q -- you don't say anything to him?

24 A No.

25 Q Okay, if you don't, that's fine. But

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3

A00717

Walters - Brewer

1 you do take a casual look around to see if there's any
2 damage and, if there is, you will check yes?

3 A Yes, yes.

4 Q And if your people do damage to the
5 farm, you will also check yes?

6 A Yes.

7 Q Okay. Going to the second block of
8 boxes, it says the drive entrance accept or
9 unacceptable, who fills that out?

10 A I do.

11 Q And what are you looking for to
12 determine whether it's acceptable or nonacceptable?

13 A The drop-offs.

14 Q I'm sorry?

15 A Mud.

16 Q I'm sorry, drop-offs, I don't
17 understand what that term means.

18 A See, cement pads at the end of houses
19 is not always level.

20 Q I see.

21 A So we call them drop-offs; when the
22 forklift have to bounce up on it, bounce off of it,
23 then we consider writing it up.

24 Q You consider that to be unacceptable?

25 A Yes.

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A00718

Walters - Brewer

1 Q Okay. And you would check that out?

2 A Yes.

3 Q So that's your decision to make?

4 A Yes.

5 Q Okay. House entrances, who fills that
6 out?

7 A I do.

8 Q And how do you go about deciding
9 whether it's acceptable or not?

10 A The same reason, cement pad, moisture,
11 wet; loading conditions.

12 Q Okay. And based on your experience,
13 you decide whether it's acceptable or not, and then
14 you check the box accordingly?

15 A Well, I check the box, yes.

16 Q Okay. Roads/loading area, what does
17 that mean?

18 A Where the trucks are loaded by the
19 forklift, if it's not level, holes, muddy, it's hard
20 for the job to get done.

21 Q Okay. And who decides whether to check
22 acceptable or unacceptable?

23 A You can check it.

24 Q Who decides which box to check it?

25 A I do.

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A00719

Walters - Brewer

1 Q And then you check whatever box you
2 think is appropriate?

3 A Yes.

4 Q Okay, litter condition, who checks
5 that?

6 A I do.

7 Q And based on what, your observation of
8 the house?

9 A Yes.

10 Q And you will decide whether it's
11 acceptable or unacceptable?

12 A As far as the words are, yes.

13 Q Well, that's the box that's supposed to
14 be checked?

15 A Yes.

16 Q And then it said bird condition, good,
17 fair or poor, who fills that box out?

18 A Scales.

19 Q Okay. Let's go back to litter
20 condition for just a moment. There's a line that says
21 explain; if you found the litter to be unacceptable,
22 would you write something in there?

23 A Yes.

24 Q And you'd write in what your
25 observation was of why it was unacceptable?

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A00720

Walters - Brewer

1 A Yes.

2 Q Okay. Let me ask you this: Have you

3 ever filled in for another crew leader under another

4 crew?

5 A No.

6 Q Okay. Has any crew leader ever filled

7 in for you?

8 A Yes.

9 Q Okay, who has filled in for you?

10 A Willie Davis.

11 Q Okay, anybody else?

12 A Not crew leader, no.

13 Q Okay. Let me ask you this: Have you

14 ever asked another crew leader to, because you might

15 be short, you may be down to six catchers and you

16 really can't catch with -- I mean you can catch with

17 six, but sometimes it's harder to do, have you ever

18 asked another crew leader to let you have one of their

19 catchers if they happen to have eight, for example?

20 A Yes.

21 Q Okay, and have they done so?

22 A Yes.

23 Q How about the reverse --

24 A Yes.

25 Q -- when you have been carrying eight,

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A00721

Walters - Brewer

1 have they asked you to assign a crew member?

2 A Yes.

3 Q Okay. We have already talked about
4 hiring and, if I understand your testimony, you have
5 absolutely no input into that?

6 A No.

7 Q Okay.

8 MR. MARTIN: Excuse me. For the
9 clarity of the record, his response was no.

10 MR. BREWER: Yes.

11 MR. MARTIN: I mean you understand that
12 to mean no, he does not have any input into the
13 process?

14 MR. BREWER: That's what I understood
15 it to be.

16 MR. MARTIN: Okay.

17 BY MR. BREWER:

18 Q That's what you meant to say, is it
19 not?

20 A Yes.

21 Q You have no input --

22 A No input.

23 Q -- into the hiring at all?

24 A No.

25 Q Okay. It is your job to make sure your

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P.O. Box 99

Milfor

Walters - Brewer

1 crews are staffed a hundred percent, though, isn't it?

2 A Yes.

3 Q Okay. Now, let's just go back for when
4 you have asked other crew leaders to send you an extra
5 catcher if they had one because you were short; how
6 many times would you say since you have been a crew
7 leader has that happened?

8 A A few times.

9 Q Okay. And how about the reverse of
10 that, you sending an extra crew leader to them because
11 they have been --

12 MR. MARTIN: Excuse me, you said crew
13 leader.

14 THE WITNESS: Catcher.

15 MR. MARTIN: I think your question was
16 mistaken.

17 BY MR. BREWER:

18 Q All right, well, for purposes of making
19 sure the record is clear, you testified before that
20 you would call up or get in touch with another crew
21 leader to see if he could assign you another catcher
22 because you happened to be short.

23 A Yes.

24 Q And my question is how many times has
25 that happened, and you said a few?

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A00723

Walters - Brewer

1 A A few.

2 Q All right. The reverse of that
3 question: How many times have you been asked by
4 another crew leader to send a catcher when you had an
5 extra one to their crew?

6 A A few.

7 Q A few, okay. A few means different
8 things to different people; could you give me an
9 approximate number, estimate?

10 A If you can give me an approximate time
11 limit.

12 Q Yeah, from the time you have been a
13 crew leader.

14 A I'm going to say 10, 12.

15 Q Okay, that's fine, that's fine. You
16 are responsible for getting the birds from the farm to
17 the plant on time, correct? That's the crew leader's
18 responsibility?

19 A Yes.

20 Q And we have been through the
21 responsibilities here in Garrison Exhibit 2, and you
22 are responsible for making sure that the catchers and
23 the forklift operators and so forth follow these
24 procedures or any modifications that you make based on
25 your discretion?

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Walters - Brewer

1 A Yes.

2 Q Let's see. Let me just see this.

3 While you're on the farm, catching, the people take
4 breaks? You take breaks?

5 A Yes.

6 Q Okay. Who decides when to take a
7 break?

8 A I do.

9 Q The catchers are entitled to a
10 30-minute unpaid lunch, aren't they?

11 A Yes.

12 Q Who decides when that lunch period is
13 taken?

14 A I do.

15 Q When the live haul driver arrives at
16 the farm, you tell him how to position his truck or
17 where to position his truck to make the job go easier?

18 A Forklift driver.

19 Q The forklift driver does that?

20 A Yes.

21 Q Suppose there's a disagreement between
22 the driver and the forklift driver, who --

23 A We don't have that.

24 Q You don't have that?

25 A No.

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A00725

Walters - Brewer

1 Q So that's never happened?
2 A No.
3 Q Okay. Let's see. You approve
4 vacations as the crew leader, do you not?
5 A No.
6 Q You do not approve vacations?
7 A No.
8 Q All right. You authorize advance pay
9 for catchers?
10 A No.
11 Q You don't? Okay. You are responsible
12 for maintaining discipline? I think we mentioned that
13 earlier and we'll go into that a little bit further.
14 MR. MARTIN: Is that a question?
15 MR. BREWER: Yes, it is a question.
16 THE WITNESS: Yes.
17 BY MR. BREWER:
18 Q You are responsible for maintaining
19 discipline?
20 A Yes.
21 Q And I think we already talked about
22 you're responsible for planning the work as we just
23 went through this document being Garrison 2?
24 A Yes.
25 Q All right, let's see. I am going to

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A00726

Walters - Brewer

1 show you, sir --

2 MR. MARTIN: Art, might this be a good
3 time to break? We're an hour into it, sounds like
4 we're in a transition period.

5 MR. BREWER: Yes, sure.

6 (Whereupon, a short recess was taken.)

7 (Walters Exhibit 1, marked for
8 identification.)

9 BY MR. BREWER:

10 Q Mr. Walters, I'm going to give you a
11 document which has been marked as Exhibit Number 1 to
12 your deposition, and we're going to go through some of
13 these. The first page on this document bears the name
14 of an employee Syrus Bagwell, is that correct?

15 A Syrinus.

16 Q Syrinus Bagwell. And do you know
17 Mr. Bagwell?

18 A Yes.

19 Q How do you know him?

20 A He's in my crew.

21 Q And he is requesting a floating
22 holiday?

23 A Yes.

24 Q But he wants the money only?

25 A Yes.

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A00727

Walters - Brewer

1 Q Does that mean that he will work the
2 day but wants to be paid an additional day's pay?
3 A Yes.
4 Q Okay. And at the bottom I see that you
5 have approved this, is that correct?
6 A Yes.
7 Q That's your signature on the box that
8 says approved?
9 A No.
10 Q That's not your signature?
11 A No.
12 Q Okay. How about the check mark in the
13 box that says approved?
14 A No.
15 Q That's not your signature either?
16 A No.
17 Q All right. Let's go to the next one, I
18 see a Walter Brown.
19 A Yes.
20 Q Do you know Mr. Brown?
21 A Yes.
22 Q How do you know him?
23 A At one time, he was my forklift driver.
24 Q All right. And he is requesting a
25 floating holiday but only wants money?

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A00728

Walters - Brewer

1 A Yes.

2 Q And I see your signature where it says

3 approved; is that your signature?

4 A No.

5 Q Did you approve that he could get money

6 only?

7 A No.

8 Q You didn't?

9 A No.

10 Q And the one before with Mr. Bagwell,

11 you didn't approve that he could get money only?

12 A No.

13 Q Okay. Let's go to the next paper, is

14 that Brown? Walter -- I can't make out the last name,

15 can you?

16 A Yes, it's Walter Brown.

17 Q Brown, okay. And he is requesting some

18 time off, two weeks, is he not?

19 A Are we on the same page, 3-28-03?

20 Q I'm looking at, yes, 3-28-03.

21 A Yes.

22 Q He's requesting some vacation full days

23 and he's also requesting a day off?

24 A Yes.

25 Q And is that your signature at the

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A00729

Walters - Brewer

1 bottom where it says approved?

2 A Yes.

3 Q Okay, so you approved his vacation and
4 the day off?

5 A Yes.

6 Q Okay. Next page is Mr. Brown again,
7 and he is requesting -- is this the same vacation he's
8 requesting again, 3-28-03? This is two copies of the
9 same document, I see. And that's your signature.

10 The next page is a Walter Brown, is
11 this the same Mr. Brown --

12 A I'm assuming.

13 Q -- who worked in your crew?

14 A I'm assuming, yes.

15 Q He's requesting a floating holiday?

16 A Yes.

17 Q And is that your signature where it
18 says supervisor's signatures?

19 A Yes.

20 Q And you approved that day off?

21 A Yes.

22 Q Okay. Isaiah Daniels, we mentioned
23 Mr. Daniels earlier; he's requesting a calendar day
24 off, money only, is that your signature?

25 A No.

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A00730

Walters - Brewer

1 Q Okay, did you approve that he could get
2 money only?

3 A No.

4 Q Okay. Next page is Mr. Daniels again,
5 he is requesting a floating holiday off, is that
6 correct?

7 A Yes.

8 Q And is that your signature approving
9 it?

10 A No.

11 Q Did you approve that he could have the
12 day off?

13 A No.

14 Q So then he just was off and you didn't
15 know anything about it, is that what you're telling
16 me?

17 A No, I'm not going to say I didn't know
18 about it, but I didn't sign this.

19 Q All right. But my question is if you
20 didn't sign it, did you approve that he could take the
21 day off?

22 A No.

23 Q Okay. Let's go to Mr. Daniels again.
24 He's requesting some vacation from 8-29-03 to 9-4-03?

25 A Yes.

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A00731

Walters - Brewer

1 Q And is that your signature approving
2 his vacation?
3 A Yes.
4 Q Okay. You knew about that one?
5 A Yes.
6 Q And you approved it, okay. Mr. Daniels
7 again, he's requesting a calendar day for money only?
8 A Yes.
9 Q And is that your signature approving
10 it?
11 A No.
12 Q Mr. Daniels again, requesting a
13 floating holiday, pay only, is that your signature
14 approving that?
15 A Yes.
16 Q Okay, you approved that one. How about
17 Mr. Daniels again, this is the same Mr. Daniels who is
18 a member of your crew?
19 A Yes.
20 Q Okay, he's asking for I guess it says
21 one week, take three days off but he only wants money;
22 am I interpreting that correctly?
23 A Yes.
24 Q Okay. Is that your signature approving
25 that?

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A00732

Walters - Brewer

1 A Yes.

2 Q Okay. Mr. Daniels again, he wants a
3 calendar day off for money only?

4 A Yes.

5 Q Is that your signature approving that?

6 A Yes.

7 Q Arthur Fosque, am I pronouncing that
8 correctly?

9 A Yes.

10 Q Okay. And Mr. Fosque is requesting
11 vacation from September 15 through September 19, is
12 that correct?

13 A Yes.

14 Q Is that your signature approving his
15 vacation?

16 A Yes.

17 Q Mr. Fosque again -- by the way, did I
18 ask you if he was a member of your crew?

19 A Yes.

20 Q Is Mr. Fosque a member of your crew?

21 A Yes.

22 Q Thanks, okay. Next document says he
23 wants February 9 off, is that your signature approving
24 that?

25 A Yes.

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Pamela C. Washington, RPR

P.O. Box 99

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A00733

Walters - Brewer

1 Q Okay, so you gave him the day off.
2 Mr. Fosque again, floating holiday, okay, is that the
3 16th or the 11th, I'm not sure, looks like it could be
4 the 16th.

5 A I'm not sure.

6 Q Well, whichever day it is, he's
7 requesting for an anniversary date, is that your
8 signature approving that?

9 A Yes.

10 Q Mr. Fosque again, requesting another
11 day off, is that your signature approving that day
12 off?

13 A Yes.

14 Q Mr. Leonard, Roy Leonard, do you know
15 Mr. Leonard?

16 A Yes.

17 Q How do you know him?

18 A I work with him.

19 Q Was he a catcher on your crew?

20 A No.

21 Q What position did he have?

22 A He was a catcher.

23 Q But he wasn't on your crew?

24 A No.

25 Q Okay. He's asking for money only for

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P.O. Box 99 Milford, 3

A00734

Walters - Brewer

1 it looks like two days off, and that is not your
2 signature I gather?

3 A No.

4 Q All right, he wasn't on your crew,
5 okay. Mr. Leonard again, anniversary day and a
6 date -- let me just take a look at this, make sure
7 it's not copies of the same thing. That's a copy of
8 the one we just looked at.

9 Mr. Richard Satchell, do you know him?

10 A Yes.

11 Q And how do you know him?

12 A He was a member of my crew.

13 Q A catcher?

14 A Yes.

15 Q And he's requesting an anniversary
16 date, it looks like for money only?

17 A Yes.

18 Q Is that your signature?

19 A No.

20 Q Okay. Did you approve that he could
21 have money only?

22 A No.

23 Q Mr. Satchell again, requesting three
24 weeks' pay on vacation; is that your signature at the
25 bottom?

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Walters - Brewer

1 A No.

2 Q Did you approve that he could have
3 three weeks' pay?

4 A No.

5 Q Mr. Satchell again, is requesting money
6 only for full days, and it says checks for week of
7 June 7; is that your signature approving that?

8 A Yes.

9 Q So you approved that one. Let's go to
10 Mr. Satchell again, is that your signature at the
11 bottom?

12 A No.

13 Q Okay. Did you approve the money only
14 for Mr. Satchell on this day?

15 A No.

16 Q Mr. Satchell again, is that your
17 signature at the bottom?

18 A No.

19 Q Did you approve the floating holiday
20 for him?

21 A No.

22 Q He's requesting the day off, so he
23 didn't work this date and you didn't approve it?

24 A I couldn't tell you, I wouldn't know.
25 I have to check into my records in order to find out

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Pamela C. Washington PDP
P.O. Box 99 Milfo: 963

A00736

Walters - Brewer

1 whether he worked that day or not.

2 Q What records would you check?

3 A I check my orders. Each day of my
4 orders I write down, I write down the men that work, I
5 write down the men that don't.

6 Q Okay. Those records that you refer to,
7 do they have a title of any kind or --

8 A It's my orders, my daily orders.

9 Q Your daily orders that you get from the
10 company?

11 A Yes.

12 Q Okay, and you maintain a copy of those?

13 A I maintain them. I maintain them, the
14 original.

15 Q Oh, okay, the daily records, okay. And
16 that's what they're called, daily records?

17 A That's what I call them.

18 Q Okay.

19 A It's my daily orders.

20 Q Daily orders, I'm sorry, daily orders.

21 And you keep them. So you don't know whether he
22 worked or not, you'd have to check?

23 A Yes.

24 Q All right. Next on Mr. Satchell, is
25 that your signature at the bottom?

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Pamela C. Wash
P.O. Box 99 Milfo

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A00737

Walters - Brewer

1 A Which one are we on here?
2 Q I'm on the one that bears the date of
3 it looks like 5-23-03.
4 A Yes.
5 Q That's your signature at the bottom?
6 A Yes.
7 Q And he is requesting full days of pay,
8 it appears to me; is that what it looks like? He
9 wants both checks?
10 A Yeah, that's the way it looks.
11 Q Okay, and you approved that?
12 A Yes.
13 Q Next, Jasper Smith, do you know Mr.
14 Smith?
15 A Yes.
16 Q How do you know him?
17 A Member of my crew.
18 Q Catcher?
19 A Yes.
20 Q All right. He is requesting it says
21 extended period, and then I see two weeks, okay, is
22 that your signature approving his request for time
23 off?
24 A Yes.
25 Q Okay. And two weeks is what he wants,

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A00738

Walters - Brewer

1 and that's what you let him have?

2 A If personnel qualified it, yeah.

3 Q Okay, but I mean he says extended
4 period, and the date requested July 20, '04, and I see
5 two weeks; that's what he wanted, was two weeks,
6 that's the extended period?

7 A Yes.

8 Q Okay. Next document, is that your
9 signature at the bottom?

10 A No.

11 Q Okay, did you approve Mr. Smith having
12 money only for a calendar day?

13 A No.

14 Q Mason Tindley, do you know him?

15 A Yes.

16 Q Who is Mr. Tindley?

17 A Catcher in my crew.

18 Q And he's requesting four weeks of pay,
19 is that right?

20 A Yes.

21 Q And is that your signature, along with
22 that of Mr. Walter Brown at the bottom?

23 A No.

24 Q Is that Mr. Brown's signature?

25 A Unknown.

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Walters - Brewer

1 Q What?

2 A I could not tell you.

3 Q Who is Mr. Brown?

4 A Mr. Walter Brown, I'm assuming, as far
5 as the dates are concerned, this was when I was out on
6 medical, and possibly Mr. Brown was taking my place.

7 Q Oh, I see. That's right, I forgot you
8 were out on medical. Let me just check the dates
9 here. Yes, you didn't come back until the 18th, you
10 were out on leave, I see, okay. Let's go to April
11 '04, is that your signature at the bottom?

12 A Yes.

13 Q And this is for Mr. Leon Tucker?

14 A Yes.

15 Q Who is Mr. Tucker?

16 A Catcher in my crew.

17 Q And he's requesting a day off, is that
18 correct?

19 A Yes.

20 Q And you're approving that?

21 A Yes.

22 Q All right. Mr. West, Russell West, do
23 you know Mr. West?

24 A Yes.

25 Q Who is he?

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